

EXHIBIT A

ATTACHMENT A

DEFINITIONS

For purposes of this Attachment A, the following definitions apply:

1. “You,” “Your,” “Yours” refer to George Yousef Nasra.
2. “ASRES” refers to Al Shaya Real Estate Services and Contracting Company W.L.L. and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.
3. “Communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
4. “IBQ” means the International Bank of Qatar, and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.
5. “Anas Al Jumaily” refers to the individual named Anas Al Jumaily, whose name may also be spelled Anas Al-Jumaily, Anas Al Jumaili, Anas Aljumaily, Anas Aljumaili, Anas Al Jumaly, Anas Al Jumali, Anas Aljumaly, or Anas Aljumali.
6. The term “Al Shaya Group” means M.H. Alshaya Co. W.L.L., and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.
7. “QGC” means the Qatar Generator Company, and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors,

officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.

8. “Person(s)” refers to any natural or any legal entity, including, without limitation, any business or governmental entity or association.

9. The term “United States Air Force” refers to the United States Air Force, as well as any affiliated groups, contractors, representatives, employees, and attorneys, and the Al Udeid Air Base in Qatar.

10. The term “United States Army” refers to the United States Army, as well as any affiliated groups, contractors, representatives, employees, and attorneys, and the As Sayliyah Army Base in Qatar.¹

11. “NBK” means the National Bank of Kuwait, and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.

12. “Qatari Public Prosecution” is any Qatari prosecutor, including any individual vested with authority to carry out prosecution in Qatar, in their individual capacity, as well as under the auspices of the Office of the Attorney General. This definition includes all Persons or representatives acting on behalf of the Qatari Public Prosecution or purporting to do so.

13. “Dolmen” means Dolmen Development, S.A.L., registered in Beirut, Lebanon, and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.

¹ Alternative spellings of Sayliyah include Sailia, Sailya, Sayliya, Saylya, Saylia, and Sailya.

14. “Prosecution Report” means the Report of the Committee Appointed by the Public Prosecution Regarding Case No. 580 of Year 2009 issued by the Qatari Public Prosecution.

TOPICS FOR TESTIMONY

1. You, including your employment history with IBQ.
2. Your relationship with ASRES.
3. Your Communications with ASRES.
4. Your Communications with any Person about ASRES.
5. Your knowledge of, and role in, the relationship between IBQ and ASRES, including, but not limited to, any loans obtained by ASRES from IBQ.
6. Your relationship with the Al Shaya Group.
7. Your Communications with the Al Shaya Group.
8. Your Communications with any Person about the Al Shaya Group.
9. Your knowledge of, and role in, the relationship between IBQ and the Al Shaya Group, including, but not limited to, any loans obtained by the Al Shaya Group from IBQ.
10. Your relationship with QGC.
11. Your Communications with QGC.
12. Your Communications with any Person about QGC.
13. Your knowledge of, and role in, the relationship between IBQ and QGC, including, but not limited to, any loans obtained by QGC from IBQ.
14. Your relationship with Anas Al Jumaily.
15. Your Communications with Anas Al Jumaily.
16. Your Communications with any Person about Anas Al Jumaily.

17. Your knowledge of, and role in, the relationship between IBQ and Anas Al Jumaily, including, but not limited to, any loans obtained by Anas Al Jumaily from IBQ.
18. Your relationship with Hamad Abdel Aziz Al Shaya.
19. Your Communications with Hamad Abdel Aziz Al Shaya.
20. Your Communications with any Person about Hamad Abdel Aziz Al Shaya.
21. Your knowledge of, and role in, the relationship between IBQ and Hamad Abdel Aziz Al Shaya, including, but not limited to, any loans obtained by Hamad Abdel Aziz Al Shaya from IBQ.
22. Your relationship with Haitham Hamad Abdulaziz Al Shaya.
23. Your Communications with Haitham Hamad Abdulaziz Al Shaya.
24. Your Communications with any Person about Haitham Hamad Abdulaziz Al Shaya.
25. Your knowledge of, and role in, the relationship between IBQ and Haitham Hamad Abdulaziz Al Shaya, including, but not limited to, any loans obtained by Haitham Hamad Abdulaziz Al Shaya from IBQ.
26. Your relationship with Ayman Al Shaya.
27. Your Communications with Ayman Al Shaya.
28. Your Communications with any Person about Ayman Al Shaya.
29. Your knowledge of, and role in, the relationship between IBQ and Ayman Al Shaya, including, but not limited to, any loans obtained by Ayman Al Shaya from IBQ.
30. Your relationship with Mohammad Abdul Aziz Al Shaya.
31. Your Communications with Mohammad Abdul Aziz Al Shaya.
32. Your Communications with any Person about Mohammad Abdul Aziz Al Shaya.

33. Your knowledge of, and role in, the relationship between IBQ and Mohammad Abdul Aziz Al Shaya, including, but not limited to, any loans obtained by Mohammad Abdul Aziz Al Shaya from IBQ.

34. Your relationship with Abdullah Abdul Latif Al Shaya.

35. Your Communications with Abdullah Abdul Latif Al Shaya.

36. Your Communications with any Person about Abdullah Abdul Latif Al Shaya.

37. Your knowledge of, and role in, the relationship between IBQ and Abdullah Abdul Latif Al Shaya, including, but not limited to, any loans obtained by Abdullah Abdul Latif Al Shaya from IBQ.

38. Your knowledge of the relationship between the United States Air Force and ASRES.

39. Your knowledge of the relationship between the United States Air Force and Anas Al Jumaily.

40. Your knowledge of the relationship between the United States Army and ASRES.

41. Your knowledge of the relationship between the United States Army and Anas Al Jumaily.

42. Your Communications with any Person about NBK and Al Jumaily, ASRES, and/or Dolmen.

43. Your relationship with NBK.

44. Your knowledge of the relationship between NBK and Al Jumaily, ASRES, and/or Dolmen.

45. Your relationship with Dolmen.

46. Your Communications with any Person about Dolmen.

47. Your knowledge of the relationship between Dolmen and NBK, Al Jumaily, IBQ, and/or ASRES.
48. Your knowledge of any properties owned by Dolmen, ASRES, and/or Al Jumaily.
49. Your relationship with the Qatari Public Prosecution.
50. Your Communications with any Person about Qatari Public Prosecution and ASRES, Al Jumaily, Hamad Abdel Aziz Al Shaya, and/or Haitham Hamad Abdulaziz Al Shaya.
51. Your knowledge of any investigation conducted by the Qatari Public Prosecution into ASRES, Al Jumaily, Hamad Abdel Aziz Al Shaya, and/or Haitham Hamad Abdulaziz Al Shaya.
52. Your Communications with any Person about the Prosecution Report.
53. Your knowledge of the Prosecution Report.

ATTACHMENT B

DEFINITIONS

For purposes of this Attachment B, the following definitions apply:

1. “You,” “Your,” “Yours” refer to George Yousef Nasra.
2. “ASRES” refers to Al Shaya Real Estate Services and Contracting Company W.L.L. and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.
3. “IBQ” means the International Bank of Qatar, and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.
4. “Anas Al Jumaily” refers to the individual named Anas Al Jumaily, whose name may also be spelled Anas Al-Jumaily, Anas Al Jumaili, Anas Aljumaily, Anas Aljumaili, Anas Al Jumaly, Anas Al Jumali, Anas Aljumaly, or Anas Aljumali.
5. The term “Al Shaya Group” means M.H. Alshaya Co. W.L.L., and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.
6. “QGC” means the Qatar Generator Company, and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.

7. “Person(s)” refers to any natural or any legal entity, including, without limitation, any business or governmental entity or association.

8. The term “United States Air Force” refers to the United States Air Force, as well as any affiliated groups, contractors, representatives, employees, and attorneys, and the Al Udeid Air Base in Qatar.

9. The term “United States Army” refers to the United States Army, as well as any affiliated groups, contractors, representatives, employees, and attorneys, and the As Sayliyah Army Base in Qatar.²

10. “Communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

11. The term “Document” is defined as synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.

12. “NBK” means the National Bank of Kuwait, and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.

13. “Qatari Public Prosecution” is any Qatari prosecutor, including any individual vested with authority to carry out prosecution in Qatar, in their individual capacity, as well as under the auspices of the Office of the Attorney General. This definition includes all Persons or representatives acting on behalf of the Qatari Public Prosecution or purporting to do so.

² Alternative spellings of Sayliyah include Sailia, Sailya, Sayliya, Saylya, Saylia, and Sailya.

14. “Dolmen” means Dolmen Development, S.A.L., registered in Beirut, Lebanon, and its parents, divisions, subsidiaries, joint ventures, affiliated companies, predecessors, successors, partners, directors, officers, representatives, employees, attorneys, executors, trustees, and any other person or entity purporting to act on its or their behalf.

15. “Prosecution Report” means the Report of the Committee Appointed by the Public Prosecution Regarding Case No. 580 of Year 2009 issued by the Qatari Public Prosecution.

16. “Concern” means relating to, referring to, describing, evidencing, or constituting.

INSTRUCTIONS

1. This subpoena requires You to produce all Documents that are in Your actual or constructive possession, custody, or control or in the possession, custody, or control of Your attorneys, accountants, representatives, consultants, agents, employees, and any other persons or entities acting on Your behalf or otherwise subject to Your direction or control.

2. Unless otherwise stated, Documents produced in response to this subpoena should be fully inclusive for the period from January 1, 2006 to the present.

3. In construing this subpoena, the singular shall be deemed to include the plural and vice versa, so as to make the subpoena inclusive rather than exclusive. The word “and” shall be deemed to include the disjunctive “or” and vice versa. The past tense shall be construed to include the present and future tenses and vice versa. The terms “each,” “every,” “all,” and “any,” whether used separately or together, shall be interpreted to encompass all responsive material, events, incidents, documents, persons, or information.

4. If there is an objection to any part of the subpoena document requests, the grounds of the objection and the part to which the objection applies should be identified with

specificity, and documents responsive to the remaining part(s) should be produced. You shall produce all segregable portions of any responsive document to which a claim of privilege, attorney work-product, or other basis for withholding the document does not apply.

5. You may produce legible, complete, and exact copies of the original documents, provided that the originals be made available for inspection upon request by the undersigned counsel. Any and all responsive documents or data stored in electronic format shall be produced in their original unaltered format unless otherwise agreed.

6. If possible, all documents that constitute electronically stored information should be produced as single-page TIFFs with image load files showing production numbers and document breaks. If such production format would be overly burdensome, the undersigned counsel is willing to meet and confer about other production formats.

7. Where an identified document is in a language other than English, state whether an English translation of such document exists. If an English translation exists, identify and provide both documents.

8. If there is any question as to the meaning of any part of these Requests, or an issue as to whether production of responsive documents would impose an undue burden on you, the undersigned counsel for Petitioners should be contacted promptly.

9. If any information, document or thing is withheld from production on the basis of privilege, work product, immunity, third-party confidentiality requirements, or any similar claim, then you shall produce a privilege log within a reasonable and mutually agreeable time.

DOCUMENTS TO BE PRODUCED

1. Any Documents or Communications that mention or concern ASRES.
2. Any Documents or Communications that mention or concern Anas Al Jumaily.

3. Any Documents or Communications that mention or concern Hamad Abdel Aziz Al Shaya.
4. Any Documents or Communications that mention or concern Haitham Hamad Abdulaziz Al Shaya.
5. Any Documents or Communications that mention or concern Mohammad Abdul Aziz Al Shaya.
6. Any Documents or Communications that mention or concern Abdullah Abdul Latif Al Shaya.
7. Any Documents or Communications that mention or concern Ayman Al Shaya.
8. Any Documents or Communications that mention or concern the Al Shaya Group and IBQ.
9. Any Documents or Communications that mention or concern QGC.
10. A copy, including any drafts, of any loan agreement between IBQ and ASRES.
11. All notes that mention or concern any loan agreement, including all drafts thereof, between IBQ and ASRES.
12. Any Documents or Communications that mention or concern the United States Army and the provision, lease, sale, rental, purchase, letting, and/or sublease of generators.
13. Any Documents or Communications that mention or concern the United States Air Force and the provision, lease, sale, rental, purchase, letting, and/or sublease of generators.
14. Any Documents or Communications that mention or concern Mervin Koi, Mervin Coy, Marvin Koi, and/or Marvin Coy.

15. Any Documents or Communications that mention or concern NBK and Al Jumaily, ASRES, Dolmen, Hamad Abdel Aziz Al Shaya, and/or Haitham Hamad Abdulaziz Al Shaya.

16. Any Documents or Communications that mention or concern Dolmen.

17. Any Documents or Communications that mention or concern Qatari Public Prosecution and ASRES, Al Jumaily, Hamad Abdel Aziz Al Shaya, and/or Haitham Hamad Abdulaziz Al Shaya.

18. Any Documents or Communications that mention or concern the Prosecution Report.